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*Counsel for the Official Committee  
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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case.  
No. 19-30088 (DM)*

**STIPULATION BETWEEN OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS AND OFFICIAL  
COMMITTEE OF TORT CLAIMANTS  
EXTENDING TIME TO RESPOND TO  
MOTION TO ESTABLISH PROCEDURES  
FOR DISCOVERY PRECEDING PLAN  
CONFIRMATION [DOCKET NO. 5840]**

This stipulation and agreement for order (the “Stipulation”) is entered into by (i) the  
Official Committee of Unsecured Creditors (the “UCC”) appointed in the jointly administered

1 chapter 11 cases (the “Chapter 11 Cases”) of the above-captioned debtors in possession and (ii) the  
2 Official Committee of Tort Claimants (the “TCC,” and together with the UCC, the “Parties”). The  
3 Parties hereby stipulate and agree as follows:

4 **RECITALS**

5 A. On February 19, 2020, the TCC filed its *Motion to Establish Procedures for*  
6 *Discovery Preceding Plan Confirmation* (the “Motion”) [Docket No. 5840], which is set for  
7 hearing before the Court at 10:00 a.m. (Pacific Time) on March 10, 2020.

8 B. Counsel to the UCC has requested, and counsel to the TCC has agreed, that the time  
9 for the UCC to respond to the Motion be extended.  
10

11 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**  
12 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**  
13 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH**  
14 **THE UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT**  
15 **TO ORDER, THAT:**

16 1. The time for the UCC to file and serve any response or opposition to the Motion is  
17 extended through 4:00 p.m. (Pacific Time) on Friday, March 6, 2020.

18 [Signatures on next page]  
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Dated: March 2, 2020

MILBANK LLP

/s/ Thomas R. Kreller  
Thomas R. Kreller

*Attorneys for Official Committee of  
Unsecured Creditors*

Dated: March 2, 2020

BAKER & HOSTETLER LLP

/s/ Kimberly S. Morris  
Kimberly S. Morris

*Attorneys for Official Committee of  
Tort Claimants*